

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
CLERKS OFFICE
2004 OCT -4 P 4:45

UNITED STATES OF AMERICA

v.

27. FNU LNU, a/k/a "Pineo"
a/k/a "Yoel Rodriguez"
a/k/a "Osvaldo Guerrero"

29. WILLIAM FELIZ,
a/k/a "William Felix"

)
) Criminal No. 02-10113-RGS
)

GOVERNMENT'S REQUESTED QUESTIONS FOR THE JURY VENIRE

The United States of America, by its attorneys, United States Attorney Michael J. Sullivan, and Assistant U. S. Attorneys Rachel E. Hershsfang and Jennifer H. Zacks, hereby requests that, in addition to those questions commonly put to the venire in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:

(a) ever been arrested, or ever answered charges (other than for an alleged moving traffic violation) in a criminal proceeding?

(b) ever filed a lawsuit or claim of any kind against any police or other law enforcement officer?

(c) ever engaged in litigation with the federal government, that is, ever filed a claim or lawsuit

against the United States or any of its agencies, or answered some claim made against you by the federal government?

(d) been employed by the United States Attorney's Office, the United States Probation Office, the United States Pre-Trial Services Office, the United States District Court Clerk's Office, the United States Marshals Service, or the Drug Enforcement Administration, known as the "DEA"?

(e) ever been employed by, or had any involvement of any sort with, of any sort, with the Lowell, Lawrence, or Methuen Police Departments?

2. Are you aware of any prejudice that you may have against the government that would in any way impair your ability to evaluate and judge fairly and impartially the facts of this case?

3. Some of the witnesses expected to be called by the United States at trial are Special Agents of the Drug Enforcement Administration. These law enforcement officers will be called to testify as to certain matters in this case calling for specialized knowledge and skill, such as narcotics investigations.

Are you aware of any prejudice that you might have for or against a witness or other individual in this case where that witness or individual is a law enforcement officer?


4. You will hear evidence about "cooperating witnesses," people who have a criminal background, but are testifying on behalf of the government in this case. Are you aware of any feelings or beliefs you may have against such a person that would in any way impair your ability to evaluate and judge fairly and impartially the testimony offered by such a cooperating witness?

5. Have you, or anyone in your family or close circle of friends ever been treated for an addiction to any narcotic substance?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

BY:



RACHEL E. HERSHFANG
JENNIFER H. ZACKS
Assistant U.S. Attorneys

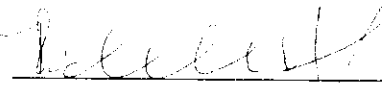
Dated: October 4, 2004

CERTIFICATE OF SERVICE

SUFFOLK, ss

Boston, Massachusetts
October 4, 2004

I, Rachel E. Hershfang, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing Government's Requested Questions For The Jury Venire to counsel of record by fax and United States mail.



RACHEL E. HERSHFANG
Assistant U.S. Attorney